



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop
DENVER, CO 80202
Phone 800-227-8917

<http://www.epa.gov/region08/pretreatment>

Ref: 8WP-CWW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DEC 21 2017

Re: EPA Pretreatment Audit, National Pollutant Discharge Elimination System Permit
Numbers MT-0022641

Mark Fitzwater
Pretreatment Coordinator
City of Helena
2108 Custer Avenue East
Helena, MT 59602

Dear Mr. Fitzwater:

The Environmental Protection Agency (EPA) conducted an audit of the Pretreatment program administered by the City of Helena (City) from September 11, 2017 to September 13, 2017.

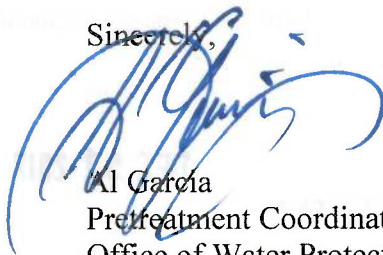
The intent of an EPA audit is to evaluate local Pretreatment programs and identify areas for improvement to build or maintain strong and effective local programs in Region 8. The audit focused on the Pretreatment building blocks: legal authority, local limits, industrial user inventory and characterization, quality of permits, sampling, inspections and enforcement. In addition, the audit served as a forum for the EPA and the City to discuss the implementation of the Pretreatment regulations and for the EPA to provide outreach, education and training.

The enclosed audit report contains corrective action items based on regulatory requirements and recommendations associated with the above-mentioned programmatic areas to ensure the City is adequately implementing and enforcing its program, in accordance with the EPA regulations. The Pretreatment Audit Summary Table of the report is a listing of corrective actions, based on audit findings, to be addressed by the City.

Within thirty (30) days of receipt of this report; (1) provide the EPA with a summary of corrective actions taken or dates that the corrective actions will be taken to address each of the findings identified in the report or submit any information that may change the findings, and, (2) provide a schedule of status reports that summarize the progress of the Pretreatment Audit Summary Table corrective actions to the EPA. These reports should be based on 6-month intervals. In addition to the corrective actions, recommendations that the City should review and address are included in the report.

Mr. Fitzwater, I want to thank your staff for the time and cooperation provided during the audit of your Pretreatment Program. If you have any questions about the audit or this report, please contact me at (303) 312-6382, (garcia.al@epa.gov).

Sincerely,



Al Garcia
Pretreatment Coordinator
Office of Water Protection

Enclosure:

1. Pretreatment Audit Report
2. Digital Camera Guidance for EPA Civil Inspections and Investigations - EPA-305-F-06-002, USEPA, July 2006

cc: Without Enclosures (Audit Report Only)

Emilio Llamozas, USEPA Region 8
Enforcement Unit

Rainie DeVvaney, NPDES Permits Unit Manager
Montana Department of Environmental Quality